

779 Cluster Authorization Basis Management Project**Project Correspondence****Subject: Waiver Request 779-98-001****Date: March 12, 1998****To:** Julia Hamrick**From:** Donna Busche**Phone:** X2601

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3/12/98

The *Nuclear Safety Manual* (1MAN-018-NSM) requires the Principal subcontractor to provide technical justification for deviations from the format for Technical Safety Requirements specified in DOE Order 5480.22, *Technical Safety Requirements*, Attachment 1, *Guidelines for Technical Safety Requirements*.

Safe Sites of Colorado, L.L.C., and Rocky Mountain Remediation Services, L.L.C. are jointly managing the 779 Closure Project. The safety basis for the closure project modified the format requirements of the control set. Waiver Request 779-98-001 documents the applicable Kaiser-Hill and U.S. Department of Energy requirements, the scope of the format deviation, and the technical justification. Responsible organizations have reviewed and approved the waiver request.

The waiver request is attached for incorporation into the Administrative Record for the 779 Closure Project.

Please give me a call if you have any questions.

**ADMIN RECORD**

B779-A-00052

Controlled Document Waiver Request

Date Prepared March 5, 1998		Tracking Number: 779-98-001	
Affected Document Number 1-MAN-018-NSM	Revision 0	Title Nuclear Safety Manual	
Waiver Type: <input type="checkbox"/> Temporary <input checked="" type="checkbox"/> Permanent	Effective From: February 12, 1998	To: Remaining life cycle of the facility	
Site Requirements Being Waived <p>Section 4.3, <i>Technical Safety Requirements</i>, 4.3.3, <i>Approach</i>, Third Paragraph</p> <p><i>K-H or Principal Subcontractor nuclear safety organizations preparing TSRs <u>not</u> in conformance with Attachment of 1 of DOE Order 5480.22, SHALL provide technical justification why a different TSR format and content is adequate. The K-H Nuclear Engineering organization may need to present and defend before DOE, with the assistance of the Principal Subcontractor nuclear safety organization, use of different TSR formats and contents.</i></p>			
DOE or Other Contractual Requirements Being Waived (if applicable) <p>DOE Order 5480.22, <i>Technical Safety Requirements</i>, Attachment 1, <i>Guidelines for Technical Safety Requirements</i>, Section 1, <i>Introduction</i>, Second Paragraph:</p> <p><i>In the interest of uniformity, contractors are encouraged to follow the format presented in this document. Justification will be required before a TSR in a format different from that presented here is approved by DOE.</i></p>			
Initiating/Requesting Principal Subcontractor Safe Sites of Colorado, L.L.C.			
Requesting Principal Subcontractor Point-of-Contact Julia Hamrick, Technical Support Manager		Phone X6812	Pager 212-4697
Organization Responsible for Affected Document K-H Nuclear Engineering			
Responsible Organization Interpretive Authority K-H Nuclear Engineering			

Controlled Document Waiver Request (continued)

Brief Description of Affected Documents and Impact (if applicable)

The 779 Closure Project has developed a safety analysis for Baseline and Decommissioning Activities. The safety analysis is documented in a Nuclear Safety Technical Report, NSTR-002-98, and is entitled *779 Cluster Decommissioning Safety Analysis*. Appendix A of the safety analysis document defines the conditions, safe boundaries and the administrative controls necessary to protect the health and safety of the public and reduce the risk to workers from uncontrolled releases of radioactive material or from radiation exposure due to inadvertent nuclear criticality.

Appendix B, *779 Cluster Decommissioning Control Set*, used DOE Order 5480.22, *Technical Safety Requirements* as guidance in the selection and documentation of controls. Appendix B deviates from the **FORMAT** requirements of DOE Order 5480.22, Attachment 1, *Guidelines for Technical Safety Requirements*. Attachment 1 to this waiver request identifies the format encouraged by DOE Order 5480.22. Attachment 2 to this waiver request identifies the format used in the development of the *779 Cluster Decommissioning Control Set*.

Appendix B meets the intent of **CONTENT** requirements and guidance specified in DOE Order 5480.22, *Technical Safety Requirements*.

Two changes from the encouraged format were used:

1. The BASES for each Limiting Condition for Operation and Surveillance Requirement was provided immediately following section 3/4 and
2. The DESIGN FEATURES section was moved from an Appendix to the TSRs to a section of the TSRs.

The first change was used to facilitate implementation and understanding with the personnel responsible for implementing the control set. The second change eliminates confusion in the two format requirements (i.e., 5480.22 and NSTR format guidance). The second change simply eliminates an Appendix..

Justification:

There are no programmatic or safety impacts resulting from the modified format. Waiver is requested to obtain relief from a Site Nuclear Safety programmatic requirement to implement the TSR format guidelines established in DOE Order 5480.22, Attachment 1. This waiver provides documentation of the format changes and information necessary for K-H to track and monitor Principal Subcontractor adherence to the *Nuclear Safety Manual* for Building 779.

Approvals

Originator

D. M. Busche, 779 AB Support Team Lead, CAI

DM Busche 3/5/98

Originator's Manager

J. C. Hamrick, 779 Technical Support Manager, SSOC

JCH 3/5/98

Organization

K. D. Trice, Deputy Project Manager, RMRS

KD Trice 3/5/98

Concurred By:

D. G. Satterwhite, Manager, Operational Nuclear Safety, SSOC

DG Satterwhite 3/12/98

Approved By:

R. D. Cronin, Manager, Nuclear and Criticality Engineering, K-H

RD Cronin 3/5/98

Controlled Document Waiver Request (continued)

Other Approvals (as Required)

Approved By:

RFFO N/A

NOTE: Requirement is not a mandatory requirement from DOE Order 5480.22, *Technical Safety Requirements*. U.S. Department of Energy approval of safety analysis for the 779 Closure Project is adequate to document acceptance of the alternate format.

Approved By:

DOE-HQ N/A

5480.22 Recommended Format

Table of Contents

1	USE AND APPLICATION
1.1	Definitions
1.2	Logical Connectors
1.3	Frequency Notation
2	SAFETY LIMITS AND LIMITING CONTROL SETTINGS
2.0	Safety Limits or Limiting Control Settings for the 779 CLUSTER
3/4	OPERATING LIMITS AND SURVEILLANCE REQUIREMENTS AND BASES
3.0	General Application of Limiting Conditions for Operation
4.0	General Application of Surveillance Requirements
3.1/4.1	First LCO
3.2/4.2	Second LCO
3.3/4.3	Criticality Detection System
5	ADMINISTRATIVE CONTROLS
APPENDIX A BASES	
APPENDIX B DESIGN FEATURES	

779 Cluster Decommissioning Control Set

Table of Contents

1	USE AND APPLICATION.....	A-1
1.1	Definitions.....	A-1
1.2	Logical Connectors.....	A-5
1.3	Frequency Notation.....	A-9
1.4	Safety Basis Compliance.....	A-10
2	SAFETY LIMITS AND LIMITING CONTROL SETTINGS.....	A-11
2.0	Safety Limits or Limiting Control Settings for the 779 CLUSTER.....	A-11
3/4	OPERATING LIMITS AND SURVEILLANCE REQUIREMENTS AND BASES..	A-13
3.0	General Application of Limiting Conditions for Operation.....	A-13
4.0	General Application of Surveillance Requirements.....	A-16
3.1/4.1	Ventilation Exhaust Filtration.....	A-17
3.2/4.2	Sprinkler System.....	A-31
3.3/4.3	Criticality Detection System.....	A-42
5	ADMINISTRATIVE CONTROLS.....	A-53
5.0	General Application.....	A-53
5.1	Organization and Management.....	A-54
5.2	Ventilation/Confinement Control.....	A-57
5.3	Inventory Control and Material Management.....	A-61
5.4	Criticality Safety.....	A-63
5.5	Criticality Accident Alarm System and Notification.....	A-64
5.6	Fire Protection.....	A-66
5.7	Radiation Protection.....	A-68
5.8	Work Control.....	A-69
5.9	Maintenance and Surveillance.....	A-70
6	DESIGN FEATURES.....	A-71
7	REFERENCES.....	A-73